

Committee(s)	Dated:
Epping Forest and Commons	7 September 2015
Subject: Epping Forest District Council Green Belt Review Stage 1: UPDATE	Public
Report of: Superintendent of Epping Forest SEF 37/15	For Decision

Summary

This report informs members of the response by the City of London to Epping Forest District Council's (EFDC) Stage 1 Report of its Green Belt Review (GBRR).

EFDC presented the Stage 1 Report on its GBRR to key stakeholders, including the Conservators, on 15th June. Following Committee approval of delegated powers to the Chairman your response was sent to EFDC by the deadline of 27th July 2015. This report provides both a summary of the key issues raised by the GBRR and an update on the response that was made on behalf of the Conservators.

Although welcoming the recognition of the importance of the Buffer Lands, concern is expressed about the way in which other land in the (Green Belt) GB units closest to the Forest boundaries has been assessed in terms of contribution to the GB. The response letter also highlights the need to prevent erosion of the GB around the hamlets of High Beach and Sewardstone and our concerns on the impacts of Loughton's sprawl despite the GB. The letter (**Appendix 1**) points to the need for a more substantive assessment of the quality of the GB at Stage 2.

Recommendation(s)

Members are asked to approve:

- further engagement by officers with Epping Forest District in making the case for the protection of Epping Forest and its surrounding GB units in the forthcoming Stage 2 of the Green Belt Review process.

Main Report

Background

1. The notion of a Metropolitan Green Belt (GB) was first produced by the Greater London Regional Planning Committee in 1935 and was included in the Greater London Plan of 1944. The Town and Country Planning Act 1947 and subsequent planning guidance led to the designation of GB by Councils around London. The last Essex County Council Structure Plan (2001-2008) confirmed the entire rural area of Epping Forest District Council (EFDC) as Green Belt, designating some 92% of the District's land area.

2. EFDC committed itself to a future GB review in its revised Local Plan Alterations (2006). Its GB boundaries have been almost unchanged since the 1980s.
3. Following the abolition of Regional Spatial Strategies, which previously set housing numbers for Local Authorities, the National Planning Policy Framework (NPPF) of 2012 obliges each Local Authority to include a five year housing supply figure in its Local Plan.
4. The EFDC GB policies have always been a key part of its Local Plan, including the aim of the protection of the Forest. The need to accommodate increased demands for housing would appear to be the key reason behind the GB review at this point.
5. EFDC presented its Stage 1 Green Belt Review Report (GBRR) to parish councils and other key stakeholders, including the Conservators of Epping Forest, at a meeting on 15th June 2015. The document at this stage was non-public.
6. The Stage 1 GBRR assessment was aimed at providing a high-level review of GB Land in the District against four of the five national purposes of the Green Belt. These national purposes were set out in the NPPF that was published by the Government in March 2012.
7. The five national purposes of the GB defined by the NPPF are as follows:
 - to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns;
 - to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land.
8. Of these five criteria only the first four were used to assess the suitability of the individual GB areas in EFDC. The fifth criterion was considered as a strategic issue for both London and the District, which could not be used with sufficient certainty to assess the suitability of an individual parcel of GB.
9. The issues of declining housing supply and increasing house price inflation in London over the past 30 years has prompted a reassessment of the value of the GB. The next review of the London Plan recommends that all Local Authorities review existing GB boundaries to reflect housing need. The City of London supports the position promoted by London First that GB boundaries should be altered to accommodate increased housing demand close to transport hubs, while safeguarding key protected sites such as Epping Forest.

Current Position

10. Reflecting the short timescale for response, your Committee of 6 July delegated responsibility to the Town Clerk, in consultation with the Chairman and Deputy Chairman, to approve a response by the Superintendent of Epping Forest to the Epping Forest District Council Stage 1 Green Belt Review.

11. The letter of response sent by the Superintendent on behalf of the Conservators under delegated approval from the Chairman and Deputy Chairman is attached as **Appendix 1** to this report.
12. The letter opens by emphasising Epping Forest's connection with the birth of the GB concept which was followed by the implementation of the GB around London in the 1950s.
13. In the City's response we remind EFDC that the protection of Epping Forest is a key Local Plan Policy and one that is not addressed by lone consideration of the NPPF criteria for GB.
14. Although acknowledging that periodic GB review is necessary the City makes clear that Stage 2 of the GBRR must consider existing Local Policies and that the protection of Epping Forest should be foremost amongst them. In addition the response voices the concern that such a review should not be directed by concern for housing numbers alone as this would distort the process and could undermine the basis of the GB in the District.
15. The response welcomed the recognition of the Epping Forest Buffer Lands as an absolute constraint on development and the fact that they and Epping Forest Land are given equal weight to statutory designations for the purposes of the review process.
16. The division of the GB into units based around the settlements and landscape character of the District is accepted as a methodology (see the attached **Appendix 2**). However, concern is raised with regard to assumptions within the study's methodology, particularly that physical features like major roads and rivers are defensible boundaries that would prevent urban sprawl.
17. The response challenges the assertion that Loughton (population 31,106 – 2011 census) could be considered a small settlement when it is in effect a large town (population 20,000 – 100,000), especially given its continuous connection to the London Borough of Redbridge. This point also re-emphasises the fact that physical features, like the Central Line, do not stop sprawl.
18. In addition, the response also argues that there must be considerations made of the quality of the GB and its constituent units, especially in terms of their landscape quality including ancient features associated with the Forest.
19. With regard to the philosophical basis of the study, the response recognises that implicit to the methodology is a likelihood that not all GB units will meet their stated purpose. It is recognised that the narrow section of GB north of Buckhurst Hill, consisting primarily of Buffer Land at North Farm, has failed to check the urban sprawl of Loughton. However, the response makes strong representations that the hamlets of High Beach and Sewardstone should not be considered for and further assessment, let alone development, given their key locations adjacent to Forest boundaries and important expanses of unspoilt, wildlife-rich countryside.

20. The response promotes an alternative view on Sewardstone and High Beach that the GB boundaries should be allowed to “wash over” these settlements thereby fully integrating them within the protected landscape around the Forest, rather than seeking settlement envelopes being developed within the GB.
21. Finally, returning to the constituent GB units the response queries the assumptions that the GBRR makes in coming to the aggregate scores for those units surrounding Forest Land. The City makes clear its concern that the mapping of the units for further assessment will provide an incentive for driving inappropriate development in the absence of a new Local Plan.

Options

22. Epping Forest District Council will proceed with Stage 2 of the GBRR following publication of the initial study to a public consultation timescale that is yet to be advised. Following this assessment against the NPPF purposes, a number of constraints will be applied as part of the Stage 1 study to enable further assessments of these areas in the Stage 2 report. A further detailed response will be required by the City to the recommendations in the Stage 2 consultation.

Proposals

23. It is proposed that, should the GBRR Stage 2 response timetable close before the November 2015 or January 2016 Committee report deadlines, the Town Clerk with the Chairman and Deputy Chairman are delegated the authority to approve a full written response on behalf of the Conservators to support the integrity of the GB around the Forest and to object to boundary changes to GB parcels which might allow future developments to damage the ‘natural aspect’ of the Forest and its environs.

Implications

24. **Financial** - External consultancy support was not commissioned to support the preparation of the response letter. The only Local Risk Implication has been officer time.
25. **Legal** -The Epping Forest Acts 1878 and 1880 pre-date planning legislation that has been a key legislative feature of the following century. While Section 7 (1) of the Acts obliges the City to keep Epping Forest ‘uninclosed and unbuilt on’ this would not form a protection from compulsory purchases without the benefit of subsequent legislation regarding Site of Special Scientific Interest and the Special Area of Conservation, which cover 1,728 hectares (4,270 acres) and 1,605 hectares (3,966 acres) of the Forest respectively. To maintain the wider context and setting of the Forest, the City of London relies heavily on GB designation.

Conclusions

26. The Green Belt Review Report (GBRR) produced on behalf of EFDC as Stage 1 of its revision of the GB boundaries provides cause for concern for the protection of Epping Forest and its surrounding ancient landscape. Many of the District GB units that surround the Forest are flagged for further assessment by the report and the Conservators' response queries some of the assumptions behind this allocation, as well as raising concerns that the further assessment itself might temporarily destabilise the protection of the Forest. Your response puts forward key arguments opposing some of the conclusions of the GBRR and makes the case for a Stage 2 review that will consider the quality of the GB and its essential support for the purposes and character of the Forest.

Appendices

Appendix 1 – Letter of Response to Cllr Richard Bassett

Appendix 2 – Green Belt Review Parcel Boundaries

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